

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE: TEXAS REIT LLC DEBTOR	§ § § § § §	CASE NO. 24-10120-smr CHAPTER 11
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**LIMITED OBJECTION TO MOTION
TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS,
CLAIMS, INTERESTS AND ENCUMBRANCES (ECF No. 216)**

COMES NOW George M. Lee (“Lee”) who files this Limited Objection (Lee’s “Objection”) to the Motion to Sell Real Property Free and Clear of Liens, Claims, Interests, and Encumbrances (8052-8090 Westheimer Road) (the “Motion to Sell”)¹ filed by Debtor, Texas REIT, LLC (the “Debtor”), and in support thereof would respectfully show the Court as follows:

I. Argument and Authorities

1. Lee reiterates as if quoted verbatim herein the factual allegations and legal support contained in his previously filed Limited Objection to Amended Motion to Sell Real Property Free and Clear of Liens, Claims, Interests, and Encumbrances.²

2. Lee files this Objection for the sole and limited purpose of requesting that, should the Court grant the Motion to sell, the Court enter an order requiring that all funds other than those for payment of tax liens or valid tax lien assignments be held in escrow, a trust account, or other secured account outside of the reach of the Debtor and/or Ali Choudhri (“Choudhri”).

¹ ECF No. 164.

² ECF No. 187.

3. Lee further requests that said proceeds from the sale of the 8052-8090 Westheimer Road held in said escrow, a trust account, or other secured account not be used for the payment of any other alleged creditors of the Debtor, and that the Debtor and/or Choudhri be precluded from accessing such funds until a judicial determination is made as to the validity and priority of payment of such claims and/or interests, including but not limited to those contained in Lee's Adversary Matter.

Prayer

Therefore, for the forgoing reasons, Lee prays that this Court: (i) if the Court grants the Motion to Sell, Lee requests that the Court take the proceeds of any such sale and that said proceeds be held in escrow, a trust account, or any other secured account outside of the reach of the Debtor and/or Choudhri, and that the Debtor and/or Choudhri be precluded from accessing such funds until a judicial determination is made as to the validity and priority of payment of such claims and/or interests, including but not limited to those contained in Lee's Adversary Matter; and (ii) afford Lee any other relief to which he may be entitled to at law or in equity.

Respectfully submitted,

SPONSEL MILLER GREENBERG PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2024, I caused a copy of the forgoing document to be served by electronic transmission to all registered ECF users appearing in this case and to the parties listed on the attached creditor matrix via U.S. Mail.

/s/ Thane Tyler Sponsel III
Thane Tyler Sponsel III

Label Matrix for local noticing
0542-1
Case 24-10120-smr
Western District of Texas
Austin
Mon Jul 15 14:02:56 CDT 2024

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

